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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**INDEX NEWSPAPERS LLC**, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **SAM GEHRKE**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; **U.S. DEPARTMENT OF HOMELAND SECURITY**; and **U.S. MARSHALS SERVICE**,

Defendants.

Case No. 3:20-cv-1035-SI

**DECLARATION OF KARINA BROWN IN SUPPORT OF PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION AGAINST DEFENDANTS U.S. DEPARTMENT OF HOMELAND SECURITY AND U.S. MARSHALS SERVICE**

I, Karina Brown, declare:

1. I am an Oregon resident who lives in the City of Portland. I am a staff reporter for *Courthouse News*, and my work has also appeared in the *Willamette Week* and *Slate*. I have attended the Portland protests for the purpose of documenting and reporting on them. If called as a witness, I could, and would, testify competently to the facts below.

2. I have been a journalist for 15 years, and have reported on Portland protests since 2017. When I report on protests, I wear a large press pass issued by *Courthouse News* that says “PRESS” on it in big block letters. I also carry a professional Sony RX100 IV camera.

3. I reported on the protests downtown on the night of July 17, 2020, and into the morning of July 18. All night, I was waving my press badge, shooting photos, and yelling at federal agents and local police that I was press.

4. Around 3:00 a.m., officers were riding riot vans, hanging off the sides on runner boards, chasing groups of protesters around downtown. I could not tell if they were local police or federal agents as they were dressed in very similar black uniforms.

5. I was following a group of protesters that were running from officers. The officers kept performing massed charges and other maneuvers that were successfully breaking the group up into smaller pieces. All of a sudden, the officers separated me from the crowd and I found myself running on my own. The officers were following along in their riot van.

6. I heard the van accelerate towards me. Two officers cried out in unison, in a menacing sing-song voice, “WE’RE GONNA GET YOU!”

7. I became deeply afraid for my safety. I did not know what the officers meant by “getting” me, nor what the officers would do to me once they “got” me. I ducked behind a large column, hoping I would be safe there. But an officer cried out again: “WE CAN STILL SEE YOU!”

8. Fortunately, at this point the driver of the van sped off and I did not find out what the officer intended to do once he “got” me.

9. I was again reporting on the protests near the federal courthouse on the night of July 20. A number of protesters, probably 100 or more, were massed in the outdoor foyer area of the courthouse, in between the pillars and the boarded-up doors. I was taking photos and videos and sending tweets documenting what was going on.

10. Very suddenly, federal agents appeared in an embrasure in the courthouse wall and began shooting pepper balls at the crowd.

11. Everyone started to run, and I tried to get behind one of the pillars to avoid being shot. As I was moving toward cover, however, a federal agent shot me directly in the buttocks, twice.

12. I was less than 15 feet from the agent when he shot me. At that distance I am certain it was no accident that he hit me in that area. The agent targeted me as a member of the press when I was running away, and targeted my buttocks to add sexual harassment to injury.

13. Fired at such close range, the shots were extremely painful and concentrated. The toxic pepper powder spread to my face, where it caused so much pain that I was unable to continue reporting. It continued to burn for hours. I have covered a lot of protests, and been around a lot of tear gas and pepper spray fired by Portland police, but they have rarely burned for more than 30 minutes. Whatever chemicals federal agents were using felt much, much stronger.

14. I would like to continue attending and documenting the protests. That is my job, and I plan to begin covering the protests every night. I am fearful, however, that federal agents or local police will continue to target me, both as a member of the press and as a woman, and possibly injure me to a much greater extent than they did on this occasion.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: July 21, 2020

DocuSigned by:  
*Karina Brown*  
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Karina Brown